

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO <i>ex rel.</i>)	
State Engineer,)	
)	
Plaintiff,)	No. 69cv07941-MV/LFG
)	
v.)	Rio Chama Stream System
)	
ROMAN ARAGON, <i>et al.</i> ,)	Section 7
)	Jicarilla Apache Nation
Defendants.)	
_____)	

MOTION FOR EXTENSION OF TIME

The Plaintiff Intervener the United States of America (“United States”) respectfully requests the Court to grant a further extension of time to submit a proposed consent order to the Court describing the water rights of the Jicarilla Apache Nation (“Nation”) in Section 7 of the Rio Chama Stream System, as required by the October 16, 2012 *Order Extending Time to Submit Consent Order* (No. 10868). In support of this motion the United States asserts:

1. The October 16, 2012 order requires the Plaintiff State of New Mexico *ex rel.* State Engineer (“State”), the United States and the Nation to submit a proposed consent order, describing the water rights of the Nation in Section 7, to the Court’s Water Rights Law Clerk by November 29, 2012.
2. During review of the proposed consent order, the U.S. Department of Justice and the U.S. Department of the Interior have requested the Jicarilla Nation to provide additional documentation, which is expected to be forthcoming. However, conflicting commitments of persons involved in responding to the United States’ request may delay that response past the holiday season.

3. Based on the information now available from the Departments of Justice and Interior, the undersigned counsel for the United States believes final review and approval of the proposed Jicarilla consent order by the United States can be completed soon after receipt of the requested documentation and within an additional 45-day extension of time, or by January 14, 2013.

4. Counsel for the State and Counsel for the Nation do not oppose the extension requested by this motion.

WHEREFORE the United States respectfully requests an extension of time until January 14, 2013 to complete the review process so that the parties can jointly submit a proposed consent order to the Court for approval.

Electronically Filed

/s/ Bradley S. Bridgewater

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COUNSEL FOR THE UNITED STATES

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2012, I filed the foregoing electronically through the CM/ECF system, which caused the parties on the electronic mailing list to be served via electronic mail as more fully set forth in the Notice of Electronic Filing.

/s/ Bradley S. Bridgewater
BRADLEY S. BRIDGEWATER